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Ze-gen's Statement regarding the new APS Regulations

Q: What criteria should be required for any of the specified eligible technologies or fuels?

The guidelines that determine technology eligibility for the Alternative Energy Portfolio Standards should be determined based solely on emissions standards. This allows for technological innovation aimed toward establishing the most effective methods for converting waste streams into high quality synthesis gas and green energy. The absence of limitations on specific technology type, and the focus on emissions standards, instead, protects any environmental concerns, while allowing biomass gasification facilities the necessary freedom to explore the rapidly changing nature of this technology. Once acceptable targets are established, the Commonwealth should encourage the technology types that meet these targets to provide renewable and alternative energy to the state. The Division of Energy Resources and the MA Department of Environmental Protection should together set the emissions limits deemed appropriate in accordance with the DEP's goals for air quality in Massachusetts.

Ze-gen's gasification technology—and other similar technologies—aims to change the way in which waste products are viewed in this state and across the country. Instead of a challenge, these biomass byproducts should rather be seen as a resource to help the state meet its high environmental and renewable energy standards. Currently, the Massachusetts Renewable Portfolio Standards recognize landfills as eligible for Generation Unit credit for converting methane gas made from waste into electricity. It is a perverse incentive to reward landfills for producing energy from methane gas—an imperfect technology that continues to leak methane into the atmosphere—and not offer the same or similar credit to other technologies that produce energy from the identical waste source, without the landfill as an intermediary. The Commonwealth's Energy Standards should encourage all technologies that seek to reduce the gases produced from landfills. If the APS eligibility for technologies or fuels is based solely upon emissions, it will encourage the development of green technology to address the harmful effects of waste, improve the Commonwealth's energy efficiency, and simultaneously protect environmental concerns.